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Filing date: **02/07/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92054391
Party	Defendant Hal Greene
Correspondence Address	HAL GREENE PO BOX 457 LAKE HOPATCONG, NJ 07849 UNITED STATES
Submission	Other Motions/Papers
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Signature	/Amber N. Davis/
Date	02/07/2012
Attachments	Amended Declaration of Hal Greene.pdf ( 3 pages )(158217 bytes ) Declaration of Ian Jones (Exhibit B).pdf ( 3 pages )(4330483 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD**

**TIMOTHY PITKA**

**Petitioner,**

**v.**

**Cancellation No. 9205431**

**HAL JAY GREENE**

**Registrant.**

\_\_\_\_\_ /

**-AND-**

**PEOPLE MEDIA, INC.**

**Petitioner,**

**v.**

**Cancellation No. 92054457**

**HAL JAY GREENE**

**Registrant.**

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**AMENDED DECLARATION OF HAL JAY GREENE**

Pursuant to 28 U.S.C. §1746, I, HAL JAY GREENE, hereby declare as follows:

1. I, HAL JAY GREENE, am the owner of the trademark registration MEET.COM for an “internet dating service” (Registration No. 3088340).

2. I filed the MEET.COM trademark on September 23, 2003 through my attorney at the time James David Jacobs.

3. The date that I first used the MEET.COM trademark in commerce was October of 2004.

4. In October of 2004, I launched the [www.meet.com](http://www.meet.com) website for the first time and offered internet dating services via the website. At that time, members were signing up on the site.

5. The website was then taken down and put back up at various times throughout 2004 – 2010. The reason for taking the website down was primarily a lack of funding.

6. At no time, however, from September of 2004 until December of 2010 when I turned the website over to Interactive Personals, LLC was the website down for more than six (6) months.

7. At all times from 2004 until December of 2010, I had the intent to resume use of the MEET.COM trademark.

8. In November of 2010, I granted an exclusive worldwide right to use, reproduce, publish, perform and display the MEET.COM trademark in association with the advertisement and sale of any and all goods and services to Aire Holdings, Inc. who then assigned that right to Interactive Personals, LLC.

9. It's my understanding that Interactive Personals, LLC has been working diligently over the past year to both revamp the [www.meet.com](http://www.meet.com) website and to develop an iPhone application under the MEET.COM mark.

10. On Friday, February 3, 2012, I received a phone call from Ian Jones the owner of Interactive Personals, LLC who informed me that there were two cancellation proceedings pending against the MEET.COM trademark.

11. This is the first time that I became aware of any cancellation proceedings pertaining to the MEET.COM trademark.

12. The P.O. Box currently listed on my trademark registration is no longer in use. I closed that P.O. Box in 2007 when I moved.

13. Therefore, I never received notice of the proceedings from the USPTO or from the Petitioners.

14. However, if the Petitioners or their attorneys were to go onto the New Jersey Secretary of State website and look up my name and/or MEET.COM they would find the Corporate Records for MEET.COM, LLC which lists the following address: 67 Ripplewood Drive, Lake Hoptacong, NJ 07849.

15. Although I do not currently live at this address my friend does, and anytime I receive mail at the address he forwards it to me at my new address which is 550 State Route 299, Suite 500, Highland, NY 12528.

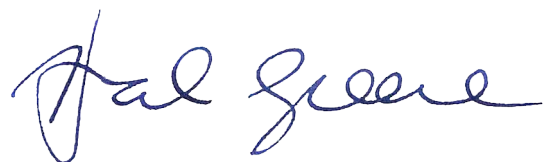
16. Therefore, if Petitioners or their attorneys would have made the effort to find my address and send the notice to the 67 Ripplewood Drive address, I would have received notice and defended the cancellation proceedings.

17. Moreover, I never received notice of the proceedings from my attorney James David Jacobs. Although he is no longer with Baker & McKenzie, if the Petitioners would have sent notice to the law firm, they surely would have contacted me.

18. In any case, immediately upon being made aware of the cancellation proceedings and after speaking with my licensee we retained trademark counsel.

I declare under the penalty of perjury that the foregoing is true and correct.

DATED this 7<sup>th</sup> day of February, 2012.



HAL JAY GREENE, MEET.COM Trademark Owner

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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**TIMOTHY PITKA**

**Petitioner,**

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**PEOPLE MEDIA, INC.**

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**Cancellation No. 92054457**

**HAL GREENE**

**Registrant.**

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**DECLARATION OF IAN JONES**

Pursuant to 28 U.S.C. §1746, I, IAN JONES, hereby declare as follows:

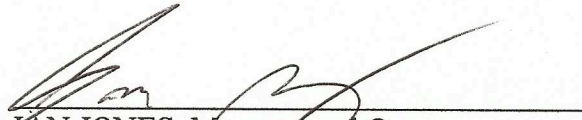
1. I, IAN JONES, am the manager and owner of Interactive Personals, LLC, a Florida limited liability company and Aire Holdings, Inc., a Florida Corporation.
2. Interactive Personals, LLC is the exclusive licensee of the trademark registration MEET.COM for an "internet dating service" (Registration No. 3088340).
3. Aire Holdings, Inc. entered into a license agreement with HAL GREENE in November of 2010 wherein Aire Holdings, Inc. was granted the exclusive worldwide right to use, reproduce, publish, perform and display the MEET.COM trademark in association with the advertisement and sale of any and all goods and services.



4. Aire Holdings, Inc. then assigned that right to Interactive Personals, LLC.
5. At the time of the agreement, HAL GREENE was using the MEET.COM trademark in commerce. I know that he was using it in commerce because I viewed his website at [www.meet.com](http://www.meet.com).
6. I know that there have been periods of time when the website was down, but to my knowledge it was never longer than six (6) months and HAL GREENE, Aire Holdings, Inc. and Interactive Personals, LLC have always had the intent to resume use of the MEET.COM mark.
7. As part of my licensee with HAL GREENE, I have an option to purchase the MEET.COM trademark.
8. It has been my intention to purchase the trademark all along and I have been working diligently over the past year to revise the [www.meet.com](http://www.meet.com) website as well as to launch an iPhone application under the MEET.COM name.
9. I have spent a significant amount of time and money on developing both the [www.meet.com](http://www.meet.com) website and the MEET.COM app.
10. On Friday, February 3, 2012, I was talking to my listing agent and she informed me that an investor looked up the MEET.COM trademark and noticed that there were two cancellation proceedings pending.
11. This is the first time that I became aware of any cancellation proceedings pertaining to the MEET.COM trademark.
12. Because I am not currently the owner of the trademark, I do not receive any papers or correspondence from the USPTO pertaining to the MEET.COM trademark.
13. Immediately upon being made aware of the cancellation proceedings I contacted my corporate counsel who then referred me to trademark counsel.

I declare under the penalty of perjury that the foregoing is true and correct.

DATED this 7<sup>th</sup> day of February, 2012.



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IAN JONES, Manager and Owner  
INTERACTIVE PERSONALS, LLC and  
AIRE HOLDINGS, INC.